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Website: www.ottertailethanol.com

Sarah Kilgriff
Minnesota Pollution Control
Compliance and Enforcement Section

This letter is to address the three deviation groups that were reported to the state in our last deviation report. These three deviations were incorrect water flow on our CO2 scrubber and incorrect pressure drop on both the CO2 scrubber and the Vent Gas scrubber.

The incorrect water flow the CO2 scrubber deviations were caused by misinterpreting the permit requirements and also operator error. OTAE believed that during compliance checking we had flexibility in our water flow requirements. This was a misinterpretation on OTAE's part and was resolved immediately after discovering the problem. Some of the deviations were from operator error by changing the water flow set points in the plants control system. This problem has also been corrected with a two part approach. Part one was additional employee training for those operators who were involved with the deviations. Part 2 was adding the permit limits to the daily environmental compliance log that each shift supervisor fills out. All minimum and maximum permit requirements are listed on this log so operators can report problems immediately to management.

The balance of the deviations pertained to the pressure drop requirements on both the CO2 scrubber and Vent Gas Scrubber. These were caused by inaccurate gauges installed on both units. OTAE is still diligently working to correct this problem by installing different gauges and also changing the piping to each gauge. This deviation is still a challenge to OTAE but the situation is significantly improved. OTAE would like to stress that these deviations were due to inaccurate measurements taken from the process not actual high pressure drops. For this installation if the pressure drops were as high as listed then the process would be venting directly to atmosphere bypassing the scrubbers. At no time was the process bypassing the scrubbers or any other pollution control equipment.

As stated earlier OTAE has made several changes to correct its instrumentation and operator error problems. We feel at this time that our issues have been resolved our next deviation report will reflect these changes.

Sincerely

Kelly Longtin CEO, OTAE

8-20-08

B. Gunner Greene Plant Manager, OTAE COST



520 Lafayette Road North St. Paul, MN 55155-4194

Excess Emissions Reporting Form DRF-1

Continuous Monitoring Systems Reporting Form

Please note: This form has been updated. Please print, complete and remit <u>only</u> the forms. Please see the instructions to ensure proper use and understanding of definitions. <u>DO NOT</u> print and return the instructions.

Use this form to record and report excess emissions (EE) that are identified by *Continuous Monitoring Systems*. This includes Continuous Emission Monitoring Systems (CEMS) and Continuous Opacity Monitoring Systems (COMS). DRF-1 is the form you must use to report excess emissions from a stack as recorded by your facility's Continuous Emission Monitoring Systems (CEMS) and Continuous Opacity Monitoring Systems (COMS).

Address hard copy report submittals to:

1) General Facility Information

Compliance Tracking Coordinator, Fourth Floor Minnesota Pollution Control Agency 520 Lafayette Road North St. Paul, Minnesota 55155-4194

Company name: AQ permit no.: AQ file no.: Tune Report covers Quarter: 2) CEMS/COMS Data Summary Table Duration of Monitor **Duration of Excess Emissions (EE) Downtime** 2e) 2f) 4m) 41) 3i) 2g) 2a) 2b) 2c) 2d) **Downtime** Cumulative Total EE EU/SV ID Total Cumulative Exempt Monitor Monitor Total % Of TOT EE % of % of ID. Number Operating Duration of Duration of Total ID TOT Exempt EE TOT **Duration of** Number **Pollutant** Time Monitor All EE (TOT) Downtime EUOSO C*E030*

aq-f6-drf1 04/24/2008

Page 2 of 8

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5) Monitor Bypasses: Provide the following information for each period in which an emission unit is operating but is not being monitored because emissions were either partially or totally diverted around the monitoring system See Minn. R. 7017.1110 subp. 20

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٠	2a)	Monitor Id Number	CE030 FWP							

6) CERTIFICATION

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly for gathering the information, the information submitted is not the best of my knowledge and belief, true, accurate, and complete.

Signature of Responsible Official

KELLY LONG TEW
Printed Name of Responsible Official

CEO

8-20-08

Date

Please note: The individual signing must meet the definition of "responsible official" in Minn. R. 7007.0100, subp. 21.



Air Quality

Deviation Reporting Form DRF-2

Deviations Identified by Periodic Monitoring Systems or Through Recordkeeping 520 Lafayette Road St. Paul. MN 55155-4194

General Information about Deviation and Compliance Reporting

If your permit requires you to submit deviation reports or an annual compliance certification, you should use the Deviation Reporting Forms (DRFs) and Annual Compliance Certification Report, unless you get MPCA approval to use another format or your facility's permit specifies otherwise. There are two separate DRF forms: DRF-1 and DRF-2.

Use DRF-1 to report deviations recorded by your facility's continuous monitoring systems (CMS), which include continuous emission monitoring systems (CEMS), continuous opacity monitoring systems (COMS), and any other monitoring system where data is recorded continuously (e.g., using a strip chart recorder or a computer). If you are a permittee with a CEMS or COMS, notice that DRF-1 is basically the same as the Excess Emissions Report (EER) that you have submitted to the MPCA in the past. Since DRF-1 and EER are basically the same, you may continue to submit Excess Emissions Reports in place of DRF-1.

Use DRF-2 to report deviations recorded by periodic monitoring systems or deviations identified through recordkeeping (e.g., fuel use records). Periodic monitoring systems are systems in which the data collected is not recorded continuously (e.g., a temperature monitor where the data is recorded manually or recorded every 15 minutes).

Use Annual Compliance Certification Report form to report your compliance status at end of each year if required by your permit.

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11/28/2006



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Air Quality 520 Lafayette Road St. Paul, MN 55155-4194

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Summary of Deviations and Monitor Downtime: Fill out a separate row of the table for each periodic monitoring system.

Total number of readings taken (during period covered by report)	Total number of readings indicating deviations	Percent of readings indicating deviations (To calculate, divide total number of readings taken that indicate deviations by the total number of readings. Multiply that number by 100.)	Total no. of readings missed (Indicate the number of times that data was not recorded as required by your permit.)	Total percentage of readings missed (Divide number of readings missed during reporting period by number or readings required during same penod. Then multiply by 100)
113	64	57%	O	0
แร	104	92%	0	0
113	2	27.	0	0
113	94	837.	0	0
·		: 	<u> </u>	!
	of readings taken (during period covered by report)	of readings taken (during period covered by report) 113 64 113 104	of readings taken (during period covered by report) OF readings indicating deviations (To calculate, divide total number of readings taken that indicate deviations by the total number of readings. Multiply that number by 100.) OF READING STATES (To calculate, divide total number of readings. Multiply that number by 100.) OF READING STATES (To calculate, divide total number of readings. Multiply that number by 100.)	of readings taken (during period covered by report) Of readings indicating deviations (To calculate, divide total number of readings taken that indicate deviations by the total number of readings. Multiply that number by 100.) OF readings indicating deviations (To calculate, divide total number of readings taken that indicate deviations by the total number of readings. Multiply that number by 100.) OF THE INDICATION OF THE NUMBER

Deviations Discovered Through Recordkeeping: List each deviation that was discovered through recordkeeping
(e.g. your fuel use records indicate that you exceeded your fuel use limits). Provide at least the date(s) of each deviation;
magnitude of deviation; associated emission unit, the cause of each deviation, and the corrective action taken.

1.	
2.	
3.	

Certification

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly for gathering the information submitted is, to the best of my knowledge and belief, true, accurate, and complete.

Kelly donot	KELLY LONGTEN
Signature of responsible official	Printed name of person signing
CEO	8-20-08
Title	Dale

Note: The individual signing must meet the definition of "responsible official" in Minn. Rules 7007.0100, subp. 21.

Due dates:

Air Emission Pennit – Option D, where control equipment is used to reduce actual reported emissions	Deviation Report ~ if a deviation occurred	j January 30 & July 30
Air Emission Permit – State or Federal Total Facility or General	Deviation Report – whether or not a deviation occurred	January 30 & July 30
	Compliance Certification	January 31

Mail to: Air Quality Compliance Tracking Coordinator Minnesota Pollution Control Agency

520 Lafayette Road North St. Paul, MN 55155-4194